STATE WATER RESOURCES CONTROL BOARD P.O. BOX 100, SACRAMENTO, CALIFORNIA 95801

(916) 445-3085



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Mr. Nathan Lau
Water Management Division
U. S. Environmental Protection
Agency, Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Lau

UNDERGROUND INJECTION CONTROL PROGRAM: COMMENTS IN THE CALIFORNIA DIVISION OF OIL AND GAS APPLICATION FOR PRIMACY OF CLASS II INJECTION WELLS

On June 1, I provided you with detailed comments on the subject application. Since that time, further hydrogeologic analysis has revealed that 12 additional aquifers should be added to the list enclosed with that letter; data and comments on the additional aquifers are provided on the enclosed sheet.

The State Board continues to be concerned over the fate of any aquifer which (1) contains a formation water having a total dissolved solids (TDS) content of less than 10,000 milligrams per litre (mg/l); (2) yields domestic, agricultural, or industrial water to wells outside of an oil or gas field even though the TDS of its formation water within the field boundary may be greater than 10,000 mg/l; or (3) serves as a recharge zone to underlying fresh-water-bearing aquifers in an area beyond the limits of an oil or gas field.

Should you have any questions on this matter, please call Greg Williams at (916) 324-1251 or Bob Ford at (916) 322-0844.

Sincerely,

Clint Whitney

Executive Director

Enclosure

cc: Mr. Marty Mefferd
 California Division of
 Oil and Gas
 1416 Ninth Street, Room 1310
 Sacramento, CA 95814

SUPPLEMENTAL LISTING OF AQUIFERS WHICH MAY CONTAIN GROUND WATER OF TDS LESS THAN 10,000 MG/L

F1ELD	FORMATION/ZONE	COMMENT
Huntington Beach	Lakewood	Intruded continental sediments; contains Gaspur and other aquifers. Important source of ground water inland (DWR Bulletin 104-A).
Seal Beach	Recent sands	Intruded along coast line. Inland sands are recharge areas to underlying aquifers (DWR Bulletin 104-A).
Wilmington	Gaspur	Same comment as for Lakewood Formation, Huntington Beach Field.
	River gravels	An intruded area. DOG application states that the water is used "only for industrial purposes".
Bellevue,	Tulare	A major water-bearing unit in the San Joaquin Valley. Contains fresh water except basal portion which is brackish to saline (U. S. Geological Survey, Water-Supply Paper 1469). Application cites a TDS of 12,000 mg/l; the content was calculated from E-lot data; it may be less than 10,000 mg/l.
Cal Canal	Tulare-San Joaquin	Same comment as for Tulare Formation Bellevue West Field; calculated TDS is shown as "Excess of 10,000".
North Coles Levee	Tulare	Same comment as for Tulare Formation, Bellevue West Field.
South Coles Levee	Tulare	Same comment as for Tulare Formation, Bellevue West Field.
Midway- Sunset	Alluvium	DOG reports "no water present" ("CA Oil and Gas Fields"); actual water-bearing characteristics unknown.
Poso Creek	Vedder	Contains water with TDS less than 10,000 mg/l at other fields.
Rasin City	Pliocene	Non-marine sediments. Probably Tulare Formation. See comment for Tulare Formation above.
San Joaquin	Pliocene	Same comment as for Pliocene, Rasin City Field